

MELANIE D. MORGAN, ESQ.  
Nevada Bar No. 8215  
SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
**AKERMAN LLP**  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: melanie.morgan@akerman.com  
Email: scott.lachman@akerman.com

*Attorneys for Bank of America, N.A.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF NEVADA**

TRP FUND V, LLC, a Nevada Limited Liability  
Company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING  
CORPORATION, an Arizona Corporation  
registered with the Nevada Secretary of State as a  
foreign corporation; BANK OF AMERICA,  
N.A., a National Banking Association domiciled  
in the State of North Carolina; DOES I through X  
and ROE BUSINESS ENTITIES I through X  
inclusive,

Defendants.

Case No.: 2:22-cv-00830-DJA

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

TRP Fund V, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have through **June 30, 2022**, to file its response to TRP's complaint. The failure of BANA to previously file its response to TRP's complaint is a result of excusable neglect since BANA and TRP are seriously exploring settlement options. Good cause also exists to grant the requested extension so these parties can continue to explore settlement options. Settlement discussions includes this matter as well as other related quiet title matters in both in this court and in the state district court. Settlement discussions also include claims against National Default Servicing Corporation.

This is the parties' first request for an extension of this deadline and is not intended to cause any delay or prejudice to any party. Rather, it is intended as a firm date for the parties to either resolve their dispute or move forward with this matter. The parties do not, at this time, request the court's assistance in mediating this matter.

DATED this 31<sup>st</sup> day of May, 2022.

<b>AKERMAN LLP</b>	<b>THE WRIGHT LAW GROUP, P.C.</b>
<u>/s/ Scott R. Lachman</u>	<u>/s/ John Henry Wright</u>
MELANIE D. MORGAN, ESQ.	JOHN HENRY WRIGHT, ESQ.
Nevada Bar No. 8215	Nevada Bar No. 6182
SCOTT R. LACHMAN, ESQ.	2340 Paseo Del Prado, Suite D-305
Nevada Bar No. 12016	Las Vegas, NV 89102
1635 Village Center Circle, Suite 200	<i>Attorney for TRP Fund V, LLC</i>
Las Vegas, NV 89134	
<i>Attorneys for Bank of America, N.A.</i>	

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

DATED: June 1, 2022

akerman